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October 6, 2021

Via CM/ECF

The Hon. Sharon M. King, U.S.M.J.
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08001

re: **Jane Doe, o/b/o her minor child, John Doe v. Marty Small, Jr., et al.**
Docket No.: 1:21-cv-11189-JHR-SAK
Table of Contents and Table of Authorities to Supplement Plaintiff's
Opposition to Pending 12(b)(6) Motions

Dear Judge King:

This office represents the Plaintiff, Jane Doe, on behalf of John Doe, her minor son, in the above-captioned matter. The undersigned recently a Notice of Appearance for such representation. Due to the recency of the undersigned's entry, Plaintiff's Opposition to two pending motions to dismiss for failure to state a claim was timely filed, but it did not include a table of contents and table of authorities as part of the opposition brief.

Please let the attached Table of Contents and Table of Authorities serve as a supplement and amendment to Plaintiff's October 4, 2021 opposition filing, along with a Certification of Service for the said supplement. This office respectfully requests that the Court consider Plaintiff's Opposition on the merits notwithstanding the admitted procedural defect.

Thank you for the Court's attention to this matter.

Very truly yours,



John A. Fonte, Esquire

JAF/
Enclosures

cc:

Benjamin H. Zieman, Esq. (*via CM/ECF only*)
Jeffrey L. Shanaberger, Esq. (*via CM/ECF only*)

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Attorneys for Plaintiff, JANE DOE, on behalf of JOHN DOE, her minor child

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JANE DOE, on behalf of JOHN DOE, her minor child,

Plaintiff,

v.

MARTY SMALL, SR., in his official capacity as Mayor of Atlantic City, New Jersey, and individually,

LA'QUETTA SMALL-FRAZIER, in her official capacity as Former Principal of Pennsylvania Avenue School, and individually,

BARRY CALDWELL, in his official capacity as current Superintendent of the Atlantic City School District,

PAUL A. SPAVENTA, in his official capacity as former Interim Superintendent of the Atlantic City School District,

ATLANTIC CITY BOARD OF EDUCATION, a public entity, and

KAYAN AHMED FRAZIER, an individual,

Defendants.

Hon. Joseph H. Rodriguez, U.S.D.J.
Hon Sharon A. King, U.S.M.J.

Docket No. 1:21-cv-11189-JHR-SAK

CIVIL ACTION

DOCUMENT FILED ELECTRONICALLY

CERTIFICATION OF SERVICE

I, John A. Fonte, Esq., the attorney for Plaintiff, Jane Doe, on behalf of John Doe, her minor child, in this action, hereby certify that on the date hereunder, I served upon the following individuals a copy of the Table of Contents and Table of Authorities for Plaintiff's previously submitted Opposition to the Motion of La'Quetta Small to Dismiss the Amended Complaint for Failure to State a Claim, and to the Motion of Atlantic City Board of Education, Paul A. Spaventa, and Barry Caldwell to Dismiss the Amended Complaint for Failure to State a Claim, along with all supporting documents, via District of New Jersey's CM/ECF system:

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October 6, 2021
Date



John A. Fonte, Esq.